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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SHERMAINE CARROLL,
Plaintiff,
v.
NANCY A. BERRYHILL,
Acting Commissioner of Social Security,
Defendant.)
Case No. 2:17-cv-02237-MMD-PAL
JOINT STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION FOR
REVERSAL OR REMAND
)

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Reversal and/or Remand be extended for one week from March 2, 2018 to March 9, 2018. This is Defendant's third request for extension. Good cause exists to grant Defendant's request for extension. Counsel for Defendant has a debilitating migraine that impairs her vision on the date of the current filing deadline. In addition, Counsel has over 75+ active pending matters, of which require 2+ dispositive motions until mid April. Counsel also has three pending Ninth Circuit matters which require additional levels of review due in early March. Due

1 to unanticipated leave and high workload demands, Counsel needs additional time to properly respond
2 to Plaintiff's Motion for Summary Judgment. Counsel apologizes for the belated request but did not
3 anticipate being out on leave due to her debilitating migraine. Defendant makes this request in good
4 faith with no intention to unduly delay the proceedings. The parties further stipulate that the Court's
5 Scheduling Order shall be modified accordingly.
6

7 Respectfully submitted,
8

9 Dated: March 2, 2018

/s/ *Cyrus Safa

(*as authorized by email on March 2, 2018)
10 CYRUS SAFA
11 Attorney for Plaintiff

12 Dated: March 2, 2018

13 DAYLE ELIESON
14 Acting United States Attorney
15 DEBORAH LEE STACHEL
16 Regional Chief Counsel, Region IX
Social Security Administration

17 By

/s/ Tina L. Naicker
18 TINA L. NAICKER
19 Special Assistant U.S. Attorney
Attorneys for Defendant

20 **ORDER**

21 APPROVED AND SO ORDERED:

22
23
24 DATED: March 7, 2018


25 THE HONORABLE PEGGY A. LEEN
26 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

, TINA L. NAICKER, certify that the following individual was served with a copy of the

**JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION FOR REVERSAL OR REMAND** on the date and via
the method of service identified below:

CM/ECF:

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Attorneys for Plaintiff

Respectfully submitted this 2nd day of March 2018,

/s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant United States Attorney